REMARKS

Claims 1, 3-5, and 7-9 have been currently amended. Claims 2 and 6 have been canceled. Claims 10-17 have been withdrawn. Claims 1, 3-5, 7-9, and 10-17 thus remain pending in the application.

Claim Objections

The Office Action objects to the word "processes" in claim 9 and suggests that this word should read "process." This typographical error has been corrected in the current amendments.

Claim Rejections Under 35 U.S.C. § 112

The Office Action rejects claims 1-9 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, the Office Action asserts that the language "operable to" in lines 2, 5, and 7 of claim 1 renders that claim indefinite because "[i]t is unclear as to what the intended metes and bounds of the claim are, since the claim appears to cover anything and everything that does not prohibit actions from occurring." Claims 2-9 were rejected as being dependent upon claim 1.

The Office Action also asserts that "the differential bits" in line 3 of claim 4 lacks antecedent basis. Similarly, the Office Action asserts that "the differential bit" in claim 5 lacks antecedent basis.

Claim Amendments. The claims have been amended to remove all occurrences of the "operable to" language. Claims 4 and 5 have also been amended to address the rejections concerning a lack of antecedent basis.

Applicants believe that the current amendments overcome the rejections of claims 1-9

under § 112, second paragraph, and respectfully request withdrawal of those rejections.

Claim Rejections Under 35 U.S.C. § 101

The Office Action further rejects claims 1-9 under 35 U.S.C. § 101 as lacking patentable

utility. In particular, the Office Action asserts that "[c]laim 1 does not recite any code or steps for

causing the engines to do anything, but instead just includes engines that are 'operable to'

perform the suggested functions."

Applicants believe that the current claim amendments adequately address and overcome

the above rejections. As mentioned above, all occurrences of the "operable to" language have

been removed from the claims. As currently amended, independent claim 1 has a readily

apparent utility—that of manipulating data in a database, including reading data from the

database, writing data to the database, or both.

In light of the current claim amendments, Applicants respectfully request the that the

rejections of claims 1-9 under § 101 be withdrawn.

Claim Rejections Under 35 U.S.C. § 103

The Office Action rejects claims 1 and 2 under 35 U.S.C. § 103(a) as being unpatentable

over Hogan et al. (U.S. Patent No. 5,414,809) in view of Storr (U.S. Patent 7,072,302 B1);

claims 3-5 under § 103(a) as being unpatentable over Hogan et al. in view of Storr and further in

view of Henderson et al. (U.S. Patent 6,362,993 B1); claim 6-8 under § 103(a) as being

unpatentable over Hogan et al. in view of Storr and further in view of Upton (U.S. Patent

7,080,092 B2); and claim 9 under § 103(a) as being unpatentable over Hogan et al. in view of

Storr and further in view of Nakamura et al. (U.S. Patent Publication No. 2006/0064449 A1).

Applicants disagree with all of these rejections because the applied references do not, separately or in combination, teach each and every limitation recited in the claims, as currently amended.

Claim 1. Applicants note first that some of the references applied in the Office Action, in particular Hogan et. al. and Storr, are not particularly "on point" with respect to the claims of the instant application. While these references do contain key words (e.g., "graph" and "cell") that happen to appear in the claims of the instant application, their contexts of their teachings are quite distinct from the context of the claims of the instant application.

Regarding Hogan et al., they teach a method of representing data stored in a database as a visual graph on a display and permitting a user to change the underlying data by changing the appearance of the visual graph. (*See* Abstract; col. 8, lines 60-64; and Fig. 14). In Hogan et al., a "graph" is a visual representation such as a bar chart, gantt chart, or tree diagram of data stored in a database (*See*, e.g., claims 14-19 and col. 4, lines 16-22).

In stark contrast with Hogan et al., in various illustrative embodiments of the invention, the information stored in a database is organized in a computer memory as one or more graph *data structures*, and the "graph engine" recited in currently amended independent claim 1 manipulates the data in the one or more graph data structures. Thus, the term "graph," in the context of Hogan et al., differs significantly from "graph" in the context of the specification and claims of the instant application, and it is apparent that the "graphics engine 12" in Hogan et al. is quite distinct from the "graph engine" recited in currently amended claim 1.

Regarding Storr, this reference concerns the management of asynchronous transfer mode (ATM) cells in a data network (col. 1, lines 10-39). An ATM cell is quite different from the "cells derived from standardized database statements as context data blocks" recited in currently

amended claim 1. Though the term "cell" happens to appear in both contexts, the two contexts

and the nature and purpose of the two types of "cells" are distinct.

Claim 1 has been currently amended to more clearly differentiate the instant invention

from the applied references. Because the applied references do not, separately or in combination,

teach each and every limitation recited in currently amended claim 1, Applicants believe

currently amended claim 1 to be allowable. Each of claims 3-5 and 7-9 is thus also allowable at

least by virtue of its depending from allowable claim 1. Withdrawal of the rejections of claims 1,

3-5, and 7-9 under § 103(a) is respectfully requested.

A Note About the Claim Amendments

Applicants note that minor punctuation and minor typographical errors have been

corrected in the amended claims. Ample support for the amendments to claim 1 can be found in,

e.g., paragraphs [0032]-[0035] and [0042] of the specification. None of the claim amendments

submitted in this paper has introduced any new matter.

CONCLUSION

In view of the foregoing, Applicants respectfully submit that no further impediments

exist to the allowance of this application and, therefore, request an indication of allowability.

However, the Examiner is requested to call the undersigned if any questions or comments arise.
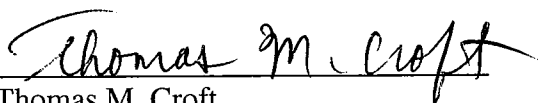
The Director is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16,

1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit

Account No. 50-1283.

Dated: Respectfully submitted,
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